

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RICK HARRISON et al.,

Plaintiffs,  
-against-

REPUBLIC OF SUDAN,

Defendant.

RICK HARRISON et al.,

Petitioners,  
-against-

AMERICAN EXPRESS TRAVEL RELATED  
SERVICES, CO., et al.

Respondents/Garnishees.

USDS SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 7-14-14

Case No. 1:13-cv-03127 (PKC)

**NOTICE OF MOTION FOR  
LEAVE TO FILE EXHIBIT  
UNDER SEAL**

*Application  
Granted.  
SO ORDERED  
JPD  
7-14-14*

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Sean C. McPhee, Esq. dated June 30, 2014; the accompanying memorandum of law dated June 30, 2014; and upon all papers and proceedings previously had herein, and in accordance with the Court's Addendum to Protective Agreement and Order (Docket No. 123 at p. 23), Respondent/Garnishee, HSBC Bank USA, N.A. ("HSBC"), will move this Court, Hon. P. Kevin Castel, United States District Judge, on submission only and without oral argument for (1) an Order granting HSBC leave to file Exhibit A to its forthcoming Third-Party Petition Alleging Counterclaims and Claims in the Nature of Interpleader under seal; and (2) granting such other and further relief as the Court deems just and proper.

Dated: Buffalo, New York  
June 30, 2014

PHILLIPS LYTHE LLP

By: /s/ Sean C. McPhee  
Sean C. McPhee, Esq.  
Attorneys for Respondent/Garnishee  
*HSBC Bank USA, N.A.*  
The New York Times Building  
620 Eighth Avenue, 23rd Floor  
New York, New York 10018  
Telephone: (212) 759-4888  
Email: smcphee@phillipslytle.com

Doc #01-2787783.1